

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	WC Docket No. 02-60
Rural Health Care)	
Support Mechanism)	
)	
)	

Comments of Beacon Telecommunications Advisors, LLC

Beacon Telecommunications Advisors, LLC (Beacon) submits these comments in response to the Commission’s Order and Notice of Proposed Rulemaking in the above-captioned proceeding.

Beacon is a regulatory, financial, and management consulting firm providing services to independent and tribal rural local exchange carriers (LECs) throughout the United States. Beacon’s clients are impacted by decisions related to the issues presented in this proceeding.

Summary of Opinion

In general, Beacon believes the Commission should address whether the statutory definition of rural health care providers is appropriate to determine if the public interest is served and the Commission’s statutory goals of Section 254 are met.

Public Interest Considerations

Beacon agrees with the Commission that, “Consistent with Section 151’s mandate, further utilization of the rural health care universal service support mechanism may benefit the development of a broader and more fully integrated network of health care

providers across our nation.”¹ Coinciding with this mandate, Beacon believes the Commission should address whether the statutory definition of a rural health care provider, pursuant to Section 254(h)(5)(B), should be altered or expanded to incorporate additional entities per Section 254(h)(5)(B)(vii). With the underutilization of the discounts currently provided pursuant to Section 254(h)(1)(a)², and consistent with Section 151’s mandate previously mentioned above, Beacon believes the public interest would be served in allowing a broadened definition of “rural health care provider.”

Additionally, in an effort to broaden and more fully develop an integrated network of health care providers across the nation, Beacon believes this base of providers should encompass entities that may, through telecommunications and information services, interact and interface with each other to help develop economies of scale. By doing this, providers will realize more benefits and be able to provide better care through increased networking and cooperation of similar entities nationwide. Incentives such as discounts to telecommunications services could make a significant difference in an entity’s ability to progress and advance rural health care facilities in rural areas across the United States.

Given this, Beacon believes the Commission should re-address the statutory definition of rural health care providers to include not only those entities specifically mentioned in Section 254(h)(5)(B), but also entities that provide rural health care benefits to small and rural communities that would otherwise not be privy to such discounts on telecommunications services. In this proceeding, the Commission seeks comment on whether they “can and should interpret the statute to enable such clinics and emergency service providers to received discounted services supported under the rural health care mechanism.”³ Beacon emphatically urges the Commission to interpret the statute to include these types of entities that perform identical functions (in many cases) to other similar entities that are eligible today. Differentiating similarly functional rural health care providers based on an interpretation of federal statute appears to be discriminatory in nature and does not serve the public interest in any fashion.

¹ FCC 02-122, WC Docket No. 02-60, para. 12

² FCC 02-122, WC Docket No. 02-60, para. 16

³ FCC 02-122, WC Docket No. 02-60, para. 16

Conclusion

Beacon advocates to the Commission to consider interpreting the federal statute to include rural health care providers not specifically mentioned in Section 254(h)(5)(B) that functionally perform the same duties as other entities that are eligible to receive discounts on telecommunications services. Since the promotion and advancement of universal service is a significant goal of the Commission, Beacon urges the adoption and consideration of its comments in this proceeding.

Respectfully submitted,

Beacon Telecommunications Advisors, LLC

[Filed Electronically]

Doug Kitch
Beacon Telecommunications Advisors
2055 Anglo Drive, Suite 201
Colorado Springs, CO 80918

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